

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

**NOTICE OF VIDEOTAPED DEPOSITION OF  
PLAINTIFF RADHAKRISHNA SHETTY**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), and pursuant to a previously agreed-upon deposition place and date, Defendants Solco Healthcare U.S., LLC, Huahai U.S., Inc., and Princeton Pharmaceutical Inc. will take the deposition upon oral examination of Radhakrishna Shetty on November 10, 2021 at 10:00 a.m EST at 1301 Dahlia Circle, Dayton, New Jersey 08810. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Drew T. Dorner  
Duane Morris LLP  
505 9th Street N.W., Suite 1000  
(202) 776-5291  
dtdorner@duanemorris.com

Date: November 9, 2021

Respectfully submitted,

s/ Drew T. Dorner

Drew T. Dorner  
Duane Morris LLP  
505 9th Street N.W.  
Suite 1000  
Washington, DC 20004-2166  
T: (202) 776-5291  
dtdorner@duanemorris.com

*Attorney for Defendants Princeton  
Pharmaceutical Inc., Zhejiang Huahai  
Pharmaceutical Co., Ltd., Solco Healthcare  
U.S., LLC, and Huahai U.S., Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of November, 2021 a true and correct copy of the Notice of Videotaped Deposition of Plaintiff Radhakrishna Shetty was served upon counsel for the parties via this Court's CM/ECF system, and was further delivered by e-mail to:

Sara Papantonio  
Levin Papantonio Rafferty P.A.  
316 South Baylen Street  
Pensacola, FL 32502  
(850) 435-7040  
spapantonio@levinlaw.com

\_\_\_\_\_  
s/ Drew T. Dorner  
Drew T. Dorner